

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TODD KREISLER,	:	Index No: 12-CIV-4052
	:	(PAE)
	:	
-against-	:	RULE 26(a)(1)
	:	DISCLOSURE
	:	
PAPA JOHN'S USA, INC., a Kentucky business	:	
corporation, d/b/a PAPA JOHN'S and 305 EAST 24 TH	:	
STREET OWNERS CORP., a New York corporation,	:	
	:	
Defendants.	:	
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Defendant 305 East 24th Street Owners Corp. (the "Coop"), pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, hereby provides the following:

Individuals likely to have discoverable information:

(1) Stephen Nardoni: Managing Agent for the Coop. Contact *via* Nardoni Realty Inc., 305 East 24th Street, New York, New York 10010. Upon information and belief, Mr. Nardoni has information generally pertaining to the allegations in the complaint, including, but not limited to, the history and use of the subject property.

(2) Coop's Expert. Pursuant to FRCP 26(a)(2), the Coop avers that it has not yet retained or made any determinations regarding the retention of any experts in this matter, but reserves the right to retain, exchange, and use experts pursuant to the Federal Rules of Civil Procedure.

Documents, data, and/or tangible things to support claims or defenses:

The Coop will produce responsive documents at a later date, under separate cover.

Computation of Damages:

The Coop has not made a claim for damages.

Applicable Insurance Agreement:

A copy of the applicable insurance agreement, under policy number 104938605, is annexed hereto.

The Coop reserves the right to amend or supplement the above response at any time up to and including the time of trial.

Dated: New York, New York
January 22, 2013

CANTOR, EPSTEIN & MAZZOLA, LLP
Attorneys for the Coop

By: _____/s/
Gary S. Ehrlich
49 West 37th Street, 7th Floor
New York, New York 10018
(212) 768-4343